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11 *Chippendales USA, LLC*

12 **UNITED STATES DISTRICT COURT**
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
14

15 CHIPPENDALES USA, LLC,
16 Plaintiff,
17 v.
18 JESSE BANERJEE
19 Defendant.

CASE NO. CV 23-3672 PA (PDx)

**PLAINTIFF'S APPLICATION FOR
ENTRY OF DEFAULT AGAINST
DEFENDANT PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 55(A)**



1 To the Clerk of the United States District Court for the Central District of
2 California:

3 Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, plaintiff
4 Chippendales USA, LLC hereby requests that the Clerk enter default against
5 defendant Jesse Banerjee for failure to plead or otherwise defend against this action
6 in a timely manner.

7 (1) As shown by the proof of service previously filed with this Court (ECF
8 17), defendant Jesse Banerjee was served pursuant to Rule 4 of the Federal
9 Rules of Civil Procedure on May 21, 2023.

10 (2) The applicable time limit for defendant Jesse Banerjee to appear or
11 otherwise respond to this action under Rule 12 of the Federal Rules of
12 Civil Procedure expired on June 12, 2023.

13 Defendant Jesse Banerjee has failed to plead or otherwise respond to the
14 complaint. This request is based on the attached Declaration of Rita Weeks, an
15 attorney for Plaintiff.

16
17 June 16, 2023

KILPATRICK TOWNSEND & STOCKTON, LLP

18
19 By: /s/ Rita Weeks

20 Evan S. Nadel
21 Rita Weeks
22 Marc Lieberstein
23 *Attorneys for Plaintiff Chippendales USA, LLC*
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Chippendales USA, LLC v. Jesse Banerjee
Case No. CV 23-3672 PA (PDx)

PROOF OF SERVICE

I am over 18 years of age and not a party to the action. I am a member of the California and New York bars and of the bar of this Court. My business address is Kilpatrick Townsend & Stockton LLP, 1114 Avenue of the Americas, New York, New York, 10036.

I served the document entitled: **PLAINTIFF'S APPLICATION FOR ENTRY OF DEFAULT AGAINST DEFENDANT JESSE BANERJEE PURSUANT TO RULE 55(A) OF THE FEDERAL RULES OF CIVIL PROCEDURE** on the defendant Jesse Banerjee, who is not registered for the CM/ECF system, as follows:

☒ On June 16, 2023, by email to Mr. Banerjee at *info@stevebanerjee.com*; and

☒ By U.S. First Class Mail. On June 17, 2023, a copy of the referenced document will be placed in a sealed envelope, with postage prepaid, for collection and mailing with the U.S. Postal Service, addressed to:

Jesse Banerjee
3573 3rd Street, Suite 206
Los Angeles, CA 90020

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Executed on June 16, 2023 in Pittsburgh, Pennsylvania.

/s/ Rita Weeks
Rita Weeks

